

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

BRANDY GEIGER,

Plaintiff,

v.

Case No. CIV-15-69-D

NSC CHICKEN LP, d/b/a CHICKEN
EXPRESS,

Defendant.

JOINT MOTION TO STAY UNEXPIRED DEADLINES

Plaintiff, Brandy Geiger and Defendant, Chicken Express (collectively “Parties”), pursuant to LCvR 7.1(h), respectfully request an Order from the Court extending the unexpired scheduling order deadlines pending the Court’s ruling on Defendant’s Motion for Summary Judgment. (Doc. #18.) In support of this Motion, the Parties state as follows:

1. The original Scheduling Order in this matter was entered on July 7, 2015. (Doc. #11). Upon joint application of the Parties, the Court entered an Order extending the original Scheduling Order deadlines. (Doc. #13). The current, unexpired scheduling order deadlines, are as follows:

¶8. Trial Docket is to be set.

¶9. Designations of deposition testimony to be used at trial to be filed by 03/28/2016.

Objections and counter designations to be filed by 7 days thereafter.
Objections to counter-designations to be filed by 7 days thereafter.

¶10. Motions in limine to be filed by 03/28/2016.

¶11. Requested voir dire to be filed by 03/28/2016.

¶12. Trial briefs (optional unless otherwise ordered) to be filed by 03/28/2016.

¶13. Requested jury instructions to be filed on or before 03/28/2016.

¶14. Proposed findings and conclusions of law to be filed not later than 03/28/2016.

¶15. Any objection or response to the trial submissions referenced in 10, 11, 12, 13, or 14 to be filed within fourteen (14) days thereafter.

¶16. The Final Pretrial Report, approved by all counsel, and in full compliance with Local Rules (*See Appendix IV*), together with a proposed order approving the report, to be submitted to the Court by 03/28/2016.

2. On February 2, 2016, Defendant filed its Motion for Summary Judgment, which is currently pending before this Court. (Doc. #18.) Plaintiff filed her Response Brief on February 23, 2016 (Doc. #20), and Defendant submitted its Reply Brief on March 1, 2016 (Doc. #21). Paragraph 7 of the original Scheduling Order states:

“If dispositive motions are filed, the trial setting will change. The parties may also move to stay unexpired scheduling order deadlines pending the Court’s ruling on dispositive motions. Absent such a motion, all deadlines will remain in force and effect.”

3. In light of the current pending summary judgment motion, the Parties request that the above unexpired deadlines be stayed until the Court’s ruling on said Motion.

4. This matter is not currently set on the Court’s trial docket.

5. There has been one other request for extension of deadlines in this matter, which was granted on November 17, 2015. (Doc. #13.)

6. The undersigned is authorized to state that both Parties have knowledge of and approve of this Motion.

WHEREFORE, Plaintiff Brandy Geiger and Defendant Chicken Express, respectfully request an Order from the Court extending the unexpired scheduling order deadlines pending the Court's ruling on Defendant's Motion for Summary Judgment. Pursuant to LCvR7.1(h), a proposed Order will be submitted for the Court's consideration through the designated email address.

Respectfully submitted,

s/Joshua C. Stockton

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2015, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants.

Joshua C. Stockton, OBA #21833: stocktonlawgroup@gmail.com
Attorney for Plaintiff

s/Jefferson I. Rust

JEFFERSON I. RUST